

Department of Energy

Idaho Operations Office 1955 Fremont Avenue Idaho Falls, ID 83401

November 3, 2004

Nicholas Ceto, INEEL Project Manager EPA Region 10 712 Swift Blvd., Suite 5 Richland, WA 99352

Daryl F. Koch, Remediation Manager Waste Management and Remediation Division Idaho Department of Environmental Quality 1410 North Hilton Boise, Idaho 83706-1255

SUBJECT: Response to September 23, 2004 letter regarding OU 3-13 Group 4 Tc-99 Investigation and OU 3-14 RI/FS (FMDP-FFA/CO-04-053)

Dear Mr. Ceto and Mr. Koch:

On September 23, 2004, you sent a letter to DOE concurring with the technical plans for installation of two sets of cluster wells south of the INTEC Tank Farm to investigate the nature and extent of technetium-99 in perched water and the aquifer beneath the northern portion of INTEC but expressing concern with the schedule, as discussed during the September 9, 2004 WAG 3 conference call. As suggested in your letter, the technical details and schedule for well construction are included in the OU 3-13 Monitoring System Installation Plan (MSIP). DOE has provided INEEL Idaho Cleanup Project contractor with incentives to complete the cluster wells before April 2005.

The Agencies have participated in recent WAG 3 calls to obtain consensus on the construction details and locations for the cluster wells. The Agencies will also be provided the data from the November colloidal boroscope studies. The available perched water and aquifer data is currently being used in the development of the draft OU 3-14 Remedial Investigation and Baseline Risk Assessment (RI/BRA), which is scheduled for May 2005. DOE does not believe that data obtained from the two new cluster wells is likely to change the conclusions documented in the RI/BRA. If data are obtained that impact the RI/BRA, DOE will confirm with the Agencies on whether the current accelerated path towards development of the OU 3-14 Record of Decision is prudent.

Given our aggressive schedule for installation of these cluster wells, DOE appreciates any efforts by your staff to help us achieve this accelerated schedule. If you have any questions, please contact Mary Verwolf at 208-526-7001 or me at 208-526-4392.

Sincerely,

Kathleen Hain CERCLA Lead

Lathleen E Hain

Cc: Mary Verwolf, DOE

Ted Livieratos, IDEQ

Kathy Ivy, EPA

Marty Doornbos, BBWI